



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

April 20, 2015

Mr. Gregory Preston
Department of the Navy
Director, BRAC Program Management Office East
Attn: Willow Grove EIS
4911 South Broad Street, Building 679
Philadelphia, PA 19112-1303

Re: Final Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base Willow Grove, Horsham, Pennsylvania (CEQ 20150069)

Dear Mr. Preston:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environment Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base Willow Grove in Horsham, Pennsylvania.

EPA appreciates the Navy's efforts to address EPA's comments within the FEIS. The Navy provided thorough and detailed responses to EPA's concerns. Although the Navy adequately addressed EPA's comments, we offer for your consideration minor comments based on our review which are presented in the attached Technical Comments document.

Thank you for working closely with EPA and for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)



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Technical Comments

Environmental Management

Table 3.5-6, IRP Sites Associated with the Former NAS JRB Willow Grove Property, for Site 5 – Fire Training Area description, the column for "Brief Description" should include COCs 1, 4-dioxane and PFC (perfluorinated compounds).

Section 3.11.3, first sentence, replace the word "tunnels" with the word "trenches."

Vegetation/Threatened and Endangered Species

Comment 0001-32 states, "The Navy has coordinated with the PFBC, and they submitted a letter on the Draft EIS dated January 27, 2014, stating they had no further comments on the EIS. A copy of this letter has been provided in Appendix B of the Final EIS." Please note that the letter is in Appendix A (not Appendix B).

Transportation

Comment 001-40 states. "Text in the EIS has been revised to clarify and more accurately describe the component of traffic volume attributed to background growth and the proposed redevelopment and also notes that it varies by intersection. It is noted in Section 4.4.1.2 that Alternatives 1 would result in a significant and unavoidable impact." The Section referenced should be Section 4.4.2.2 (not Section 4.4.1.2).

Environmental Justice

It should be noted that Environmental Justice concerns go far beyond the socioeconomic parameters, and include issues related to noise, traffic, hazardous substances, and any number of potential impacts that may affect the actual local environment, or the populations found there. Therefore, it is important to look at the impacts that may occur with respect to how they may impact current or future at-risk populations.

It is reasonable to assume that there may in fact be a potential for adverse impacts due to the presence of hazardous substances, or due to work associated with the project. That means that careful consideration should be given to assure that those impacts do not in fact occur currently, or in the future to populations that may come into close proximity to those potentially adverse conditions due to migration of contaminants, future development of the community, or other activities that may bring residents into contact with these potentially adverse conditions.



